REMARKS

Applicants respectfully request consideration of the subject application.

This Response is submitted in response to the Office Action mailed October 19,

2005. Claims 1-40 stand rejected. In this Amendment, claims 1, 15 and 29 have

been amended. No new matter has been added.

35 U.S.C. § 102 Rejections

The Examiner has rejected claims 1-40 under 35 U.S.C. § 102(b) as being

anticipated by Robinson, et al. ("New Approaches to Creating and Testing

Internationalized Software," 11-1998, hereinafter "Robinson").

Robinson does not teach or suggest the features of the present invention

that are included in the following language of claim 1:

> ...integrating at least one pseudo localization utility application with a build application to <u>provide an integrated build application;</u>
>
> <u>executing the integrated build application</u> to generate pseudo-translated locale-dependant code, wherein executing the at least one pseudo localization utility application includes:
>
> > (a) retrieving locale-dependant code from at least one storage location;
> >
> > (b) altering an appearance of the locale-dependant code; and
> >
> > (c) storing the altered locale-dependant code in at least one second storage location; and
>
> generating a pseudo-language build with the pseudo-translated locale-dependant code.

Similar limitations are included in claims 15 and 29.

Robinson is directed to a manual process for developing internationalized

software. The build application, translation and defect detection are all

independent processes, which are required to be implemented by human beings.

In particular, Robinson does not teach or suggest, inter alia, integration of a

build application with a pseudo localization utility application to provide an

integrated build application and executing the integrated build application to

generate pseudo-translated locale dependent code.

In contrast, in the presently claimed invention, the build application and

pseudo localization utility application(s) are integrated so that the pseudo

localization process is integrated into the regular build process. That is,

intervention by a human being is not required to execute the pseudo localization

process because the pseudo localization process is integrated with the build

application to provide an integrated build application.

The Examiner submits that "In the computer art, a process such as the

process in Figure 2 [of Robinson] is done/controlled by software elements."

However, Robinson clearly indicates that the process is not entirely

done/controlled by software elements:

1. The programmers write an application with the
   appropriate I18N calls for fetching strings from
   the message catalog. They also produce the
   original message catalog in English.

2. The message catalog is sent to translators (called
   localizers) who translate each string into a target
   language, such as French.

3. The application (with the original message catalog) is delivered to the test team, who verify that everything works correctly.

4. The localizers provide the translated message catalogs to the test team. The testers must now verify that the application works in the intended languages. (See pages 31-32)

Robinson, on page 32, further indicates that each of the programmers, the localizers and the testers are all independent groups of human beings.

Thus, Robinson does not integrate a build application with a pseudo localization utility application to provide an integrated build application. In fact, Robinson specifically teaches away from the present invention, as Robinson requires specific groups of people to manage and run each aspect of the process shown in Figure 2, and described throughout Robinson, independently.

The Examiner further submits that the software application only automates a process and that a program or an application that is used to replace a manual activity would not be patentable over such a manual activity, citing In re Venner.

Applicants respectfully submit that In re Venner is distinguishable from the circumstances of the present application. As noted above, the independent claims of the present invention include limitations that a build application is integrated with a pseudo localization utility application to provide an integrated build application and that the integrated build application is executed.

Thus, these claims include limitations not taught or suggested by the prior art and which involve operations which are more than mere automation of a manual activity.

Moreover, as noted in the present application, several advantages are achieved by integrating at least one pseudo localization utility application and a build application. In particular, as noted in the "Background of the Invention", "typical pseudo localization procedures are manually implemented for specific features of an application and generally require a relatively large amount of time and human effort to accomplish the desired objectives." As well known, any manual manipulation of data usually results in human errors, jeopardizing the accuracy of the final product.

In contrast, as described in the present specification beginning at page 7, line 20: "an aspect of the present invention is the integration of a pseudo localization process 103 into the regular build cycle of the software application or database in order to generate a pseudo-translation of the UI code. The pseudo-translated UI code may then be used as the basis for pseudo-language builds of the software or database to enable testing of the developing application for internationalization bugs..." Thus, the present invention involves more than mere automation of a manual activity.

Therefore, Robinson does not teach or suggest the claimed limitations of independent claims 1, 15 and 29. Claims 2-14, 16-28 and 30-40 depend, directly or indirectly, from one of the foregoing independent claims.

Applicant, accordingly, respectfully requests withdrawal of the rejections of claims 1-40 under 35 U.S.C. § 102(b) as being anticipated by Robinson.

Applicant respectfully submits that the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Marina Portnova at (408) 720-8300.

Please charge any shortages and credit any overages to Deposit Account No. 02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

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